

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 21-cv-10928

Honorable Denise Page Hood

vs.

\$3,840,772.58 U.S. dollars constituting
125 international wire transfers seized
from U.S. correspondent bank, Citibank,
between December 21, 2020 and
January 4, 2021, *et al.*,

Defendants *in rem*.

GOVERNMENT'S STATUS REPORT

The government submits this status report pursuant to the Court's Order Staying Action dated September 6, 2023. (ECF No. 140). Pursuant to 18 U.S.C. § 981(g), the court concluded a stay was warranted because continuation of these proceedings would adversely affect the ability of the Government to conduct a related criminal investigation or the prosecution of a related criminal case. PageID.867-869. The Court further ordered, as requested by the Government, that the Government file reports as to the status of this matter every 90 days, further ordering that the Government will notify the Court as soon as possible once the forfeiture action can proceed and the stay can be lifted. PageID.876. After the stay

was issued, Claimant Straightway General Trading filed an appeal of the Court's stay order. (ECF No. 163, Notice of Appeal). A motion to dismiss the appeal is briefed and pending before the Sixth Circuit Court of Appeals. (Sixth Circuit Case No. 23-1844). The government filed its first status report with sealed declaration in support on December 6, 2023. (ECF Nos. 186, 189). A second status report with a sealed declaration was filed on March 4, 2024. (ECF Nos. 190, 193).

Pursuant to 18 U.S.C. § 981(g)(5) the attached *ex parte* sealed declaration of a law enforcement officer is submitted with this report to provide an update regarding the underlying criminal investigation in this case. The government anticipates that it will move to lift the stay and for leave to amend the operative complaint in these proceedings before its next 90-day status report is due.

Respectfully submitted,

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May 31, 2024

Certification of Service

I hereby certify that on May 31, 2024, I electronically filed the foregoing using the ECF system, which will send notification of such filing to all ECF participants.

Respectfully submitted,

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